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October 29, 2021

**VIA ECF:**

The Honorable Ann M. Donnelly  
United States District Court Judge  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Kelly*, 19 CR 286 (AMD)

Dear Judge Donnelly:

Undersigned counsel writes to respectfully request a 60-day extension of time in which to file Mr. Kelly's post-trial motions in the above-captioned matter. The government does not object to this request.

Although undersigned counsel recently had an opportunity to meet with Mr. Kelly at the MDC, until this week she was unable to conduct even a cursory review of the trial record on account of other professional obligations. As such, undersigned counsel was not formally retained in this matter until just yesterday. Undersigned counsel has been retained to file post-trial motions in this matter and represent Mr. Kelly on direct appeal (should this Court deny his post-trial motions). As this Court is aware, Defendant's trial was lengthy, consisting of roughly 25 days of testimony and/or argument. Indeed, undersigned counsel cannot presently confirm that she is in possession of the complete trial record. Undersigned counsel requires an adequate amount of time to scrutinize the docket, read the pleadings and report of proceedings, and study this Court's prior orders in the case. To competently represent Mr. Kelly post-trial, undersigned counsel respectfully requests an enlargement of 60-days until December 31, 2021 in which to file his post-trial motions.

Respectfully Submitted,

/s/JENNIFER BONJEAN

cc: AUSA Elizabeth Geddes (via ECF)